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CITY OF ANTIOCH

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTEYA DANYELL WILLIAMS,
MARY RUTH SCOTT, KAREN
LATREECE COLEMAN, PRISCILLA
BUNTON, and ALYCE DENISE PAYNE,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CITY OF ANTIOCH,

Defendant.

No. C-08-2301 SBA (EDL)

**STIPULATION AND ORDER
MODIFYING DISCOVERY AND CLASS
CERTIFICATION DATES**

The parties hereby stipulate to and request a modest modification of the class certification discovery, briefing and hearing deadlines in this case. This request seeks a modest six week extension of these deadlines to accommodate the volume of discovery and witnesses in this action.

Discovery commenced in this class action after the Case Management Conference held on October 2, 2008. Since that time the parties have exchanged initial disclosures and initial written discovery, produced thousands of pages of documents and electronic data, negotiated document preservation and protective orders, and taken/defended 7 depositions out of the 30 total authorized by the Court. Plaintiffs have served subpoenas, obtained documents from the Housing Authority of Contra Costa County and have filed and won a motion to compel further production from it. Defendant has reviewed tens of thousands of emails and produced electronic and hard copy documents. It is completing review of additional documents before production. Plaintiffs and defendant have both served initial sets of interrogatories.

Plaintiffs have disclosed 40 class member and fact witnesses, including many recently identified class members.

The parties have cooperated in discovery, but it has become apparent that, due to the substantial amount of electronic data and emails involved, and the necessity of pre-disclosure document review by Defendant, and the need to depose witnesses, the current discovery cut off of June 15, 2009, does not allow sufficient time for the parties to complete class certification discovery. The parties have agreed to the following modification of the discovery and motion dates:

	Current	Proposed
Discovery Cut Off	June 15, 2009	August 3, 2009
Plaintiff Expert Report	June 15, 2009	August 3, 2009
Defendant Expert	August 3, 2009	September 14, 2009
Rebuttal Expert	September 1, 2009	October 12, 2009

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	Current	Proposed
Class Cert. Motion	September 15, 2009	October 27, 2009
Class Cert. Opposition	October 6, 2009	November 24, 2009
Class Cert. Reply	October 13, 2009 ¹	December 8, 2009
Class Cert Hearing	October 27, 2009	January 12, 2010, at 1:00 p.m.

The currently scheduled settlement conference with Judge Larson remains at June 12, 2009.

DATED: May 11, 2009


By: _____
 Brad Seligman
 Attorneys for Plaintiffs and the Proposed Class

DATED: May 11, 2009

By: _____
 Thomas Beatty
 Attorneys for Defendant

IT IS SO ORDERED.

DATED: 5/20/09


 Hon. Sandra Brown Armstrong
 UNITED STATES DISTRICT JUDGE

¹ At the Case Management Conference, the Court ordered the reply by October 13; the Case Management Conference Minutes erroneously transposed this date to October 31, 2009.